

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
NANCY TAYLOR,)
Defendant.)
Criminal No. 24-cr-10075-FDS-JGD

JOINT INITIAL STATUS CONFERENCE MEMORANDUM

The United States of America, by Joshua S. Levy, Acting United States Attorney for the District of Massachusetts, and the defendant, Nancy Taylor, by and through her attorney, Scott Lauer, Esq., submit this memorandum to address the issues delineated in Local Rule 116.5(a)(1)-(8).

1. The government has made its automatic disclosures, and the defendant is reviewing the discovery materials. The defendant has not produced any materials under Local Rule 116.1(d). The defendant has not submitted any discovery requests to the government.

2. The government will provide discovery in response to any future request according to the Local Rules and pursuant to the Federal Rules of Criminal Procedure, including any supplemental discovery if any additional materials are obtained.

3. The defendant has not yet determined whether she will request additional discovery. She anticipates doing so before the interim status conference.

4. The parties do not anticipate the need for any protective order.

5. The defendant has not yet determined whether she will be filing any motions under Fed. R. Crim. P. 12(b).

6. The parties have not yet determined whether they will be calling expert witnesses at trial at this time.

7. The parties agree that the ends of justice are served by granting a continuance until the date of the next status conference, and excluding this time from the calculation of the time within which the trial must begin outweighs the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A) and Local Rule 112.2. This exclusion will serve the ends of justice because it will provide the defendant with time to review the produced discovery and to contemplate how she wishes to proceed. A proposed order of excludable delay is attached to this status report.

8. The parties request that an interim status conference be scheduled in approximately 60 days.

Respectfully submitted,

JOSHUA S. LEVY
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NANCY TAYLOR

By her attorney,

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Dated: April 25, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ James J. Nagelberg

James J. Nagelberg
Special Assistant United States Attorney

Dated: April 25, 2024